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8

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **OAKLAND DIVISION**
12

13 JAMI ZUCCHERO, individually, and on
behalf of all others similarly situated,

14
15 Plaintiff,

16 v.

17 HEIRLOOM ROSES, INC.,

18 Defendant.
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21
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Case No. 4:22-cv-00068-KAW

CLASS ACTION

**NOTICE OF COMPLIANCE OF THE
COURT'S MODIFIED ORDER:**

- (1) **GRANTING FINAL APPROVAL OF
CLASS ACTION SETTLEMENT;**
- (2) **AWARDING ATTORNEYS' FEES
AND COSTS TO CLASS COUNSEL;
AND**
- (3) **AWARDING A SERVICE AWARD TO
THE REPRESENTATIVE PLAINTIFF**

Judge: Hon. Kandis A. Westmore

23 Representative Plaintiff Jami Zucchero ("Plaintiff"), by and through her undersigned
24 counsel, respectfully submits this Notice of Compliance of the Court's May 21, 2024 Modified
25 Order Granting Final Approval of Class Action Settlement.

26 At this time, all provisions of the Order have been satisfied and all settlement funds have
27 been disbursed in accordance therewith.
28

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Attached hereto as **Exhibit 1** is a true and correct copy of the Declaration of Carole Thompson, Associate Director of Case Management for CPT Group, Inc. (“Settlement Administrator” or “CPT”) in support of Plaintiff’s Notice of Compliance. Pursuant to the Court’s Order, CPT addresses the requested information on the total number of class members to whom notice was sent and not returned as undeliverable, the number and percentage of claim forms submitted, the number and percentage of opt-outs, the number and percentage of objections, the average, median, maximum, and minimum recovery per claimant, the method(s) of notice and the method(s) of payment to class members, the number and value of checks not cashed and administrative costs.

The Settlement provided 51,907 Class Members the opportunity to make a claim for a payment of up to \$200. Additionally, the Court approved a Service Award for Plaintiff Zucchero in the amount of \$1,500 and awarded attorneys’ fees in the amount of \$198,500, inclusive of litigation costs. Class Counsel invested a considerable amount of time and labor in litigating this matter and incurred a lodestar of \$261,185.00. In tracking the lodestar and expenses in this matter, Counsel billed 524.8 hours. The awarded attorneys’ fees represents a negative lodestar multiplier of .76 (not considering that costs incurred reduced CVN’s recovery).

To date, all disbursements to the Settlement Class Members, Class Representative, Claims Administrator, and Class Counsel were completed in compliance with the Court’s Modified Order granting Final Approval. Counsel does not believe that a compliance hearing is necessary and respectfully requests the case be closed.

Dated: March 12, 2025

COLE & VAN NOTE

By: /s/ Scott Edward Cole
Scott Edward Cole, Esq.
Attorneys for Representative Plaintiff